

**COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT
Hazardous Materials and Waste Management Division**

MEMORANDUM

TO: Chris Gilbreath
FROM: Carl Spreng
DATE: June 25, 1996
SUBJECT: Soil Sampling and Analysis Plan to Characterize IHSSs 121 and 148
at Building 123 (Rev.0), February 1998



Comments:

1. The additions to Section 6.0 - Quality Assurance improve this section considerably. Some of the commitments to QA/QC are to follow referenced procedures and guidance documents which are not readily available to the regulatory agencies. To be able to completely evaluate these commitments, CDPHE needs to be able to review these documents. The following are of particular interest:

Rocky Flats Administrative Procedure 2-G32-ER-ADM-08.02 *Evaluation of ERM Data for Usability in Final Reports*;
RMRS Quality Assurance Program (implementation of 10 CFR 830.120)
1-31000-COOP-01 *Conduct of Operations*;
1-31000-COOP 011 *Pre-Evolution Briefing*;
Corrective Action Process (CAP);
RMRS QA-3.1 Corrective Action procedure;
Site Procedures 1-D23-QAP-10.02, *Inspection*;
1-31000-COOP 019, *Returning Systems and Equipment to Service*;
1-V51-COEM-DES-210, *Design Process Requirements*;
1-I97-ADM-12.01, *Control of Measuring and Test Equipment*.

2. Section 6.11 Analytical Data states that data validation will be performed. Since data validation has not always been reported in the past, CDPHE needs to be able to review this information when it becomes available.
- * 3. The PARCC parameters are mentioned in Section 6.11, but the discussion of them is disorganized and incomplete. Two parameters, precision and accuracy, are the titles of the next two sub-sections. Two other parameters, comparability and completeness, are discussed under the accuracy sub-section. Representativeness is not discussed at all. All five parameters should be included, either within Section 6.11 or under a separate PARCC sub-section.
- * 4. The additional activities discussed in Section 8.0 need to focus on issues pertinent to the Soil Sampling and Analysis Plan. Is it anticipated that the soil sampling prescribed in this document will generate waste (e.g., IDW) and how will it be dispositioned?